

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
AMARILLO DIVISION

STATE OF TEXAS, STATE OF	§	
LOUISIANA, STATE OF MISSISSIPPI,	§	
STATE OF UTAH, JEFFREY W.	§	
TORMEY, GUN OWNERS OF	§	
AMERICA, INC., GUN OWNERS	§	CIVIL ACTION No. 2:24-cv-00089-Z
FOUNDATION, TENNESSEE	§	
FIREARMS ASSOCIATION, and	§	
VIRGINIA CITIZENS DEFENSE	§	
LEAGUE,	§	
<i>Plaintiffs,</i>	§	
v.	§	
	§	
BUREAU OF ALCOHOL, TOBACCO,	§	
FIREARMS AND EXPLOSIVES,	§	
UNITED STATES DEPARTMENT OF	§	
JUSTICE, MERRICK GARLAND, in his	§	
official capacity as Attorney General of the	§	
United States, <i>and</i> STEVEN M.	§	
DETTELBAACH, in his official capacity as	§	
Director of ATF,	§	
<i>Defendants.</i>	§	
	§	

**MOTION TO BE RELIEVED, IN PART, FROM LR 83.10**

COME NOW Plaintiffs, Gun Owners of America, Inc. (“GOA”), Gun Owners Foundation (“GOF”), Tennessee Firearms Association (“TFA”), Virginia Citizens Defense League (“VCDL”) and Jeffrey W. Tormey (“Tormey”) (collectively “Plaintiffs”), by and through undersigned counsel, and hereby request to be relieved from the requirement of LR 83.10 to have “local counsel” who lives within “50 miles of the courthouse in the division which the case is pending.”

Plaintiffs’ local counsel, Brandon W. Barnett, maintains his office at 930 W. 1st St., Suite 202, Fort Worth, Texas 76102, approximately 338 miles from the Amarillo Division, but still within the Northern District of Texas. In addition, Plaintiffs are represented by counsel who is

admitted to the Northern District of Texas, and counsel whose application for admission is forthcoming.

Plaintiffs submit they are complying with the spirit of the rule which is to have counsel who “reside[s] or maintain[s] the attorney’s principal office in this district.” Additionally, neither the parties nor this Court will be prejudiced by Plaintiffs being relieved from this requirement. Because LR 83.10 allows a plaintiff to seek “leave from the presiding judge” in order to proceed without the requirement of a local counsel who lives within “50 miles” of the courthouse, Plaintiffs respectfully request to be relieved of the “50 miles” requirement.

Additionally, while a motion for the relief requested herein is not listed in LR 7.1(h), and due to the straightforward nature of the relief requested, Plaintiffs request to be relieved of the requirement to file a brief in support upon this filing.

Respectfully submitted,

Dated: May 1, 2024

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*\* Application for admission forthcoming*

*Counsel for Plaintiffs*

**CERTIFICATE OF CONFERENCE**

Pursuant to LR 7.1(b), Counsel is unable to confer with attorneys for Defendants as no counsel has entered an appearance for Defendants and Counsel does not know who will be assigned to this matter. Out of an abundance of caution, Counsel caused this pleading to be sent to Department of Justice attorneys who were involved in previous cases with Counsel after filing.

**CERTIFICATE OF SERVICE**

I Stephen D. Stamboulieh, hereby certify that I have on this day, caused the foregoing document or pleading to be mailed by United States Postal Service first-class mail, postage pre-paid, to the following non-ECF participants:

Bureau of Alcohol, Tobacco, Firearms and Explosives  
99 New York Ave.  
Washington, DC 20002

United States Attorney General  
Department of Justice  
950 Pennsylvania Ave, NW  
Washington, DC 20530

US Attorney for the Northern District of Texas  
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1100 Commerce Street, Third Floor  
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And by electronic mail to:

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Dated: May 1, 2024.

/s/ Stephen D. Stamboulieh  
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